

Closure Plant for Hazardous Waste Drum Storage Area  
Site S-12

EPA I.D. No. OHD 044 222030  
United States Steel Corporation  
Lorain Plant  
Lorain, Ohio

EPA Region 5 Records Ctr.



320891

General Facility Description

United States Steel Corporation (USSC) has operated a hazardous waste drum storage area, designated as Site S-12, within the Lorain Plant boundaries from October 1980 to the present. USSC is permitted under interim status regulations, Hazardous Waste Permit No. 02-47-0108, to operate Site S-12 and other hazardous waste facilities within the Lorain Plant. Site S-12 is permitted for the temporary storage of the following wastes:

<u>Waste</u>	<u>Description</u>
1. Waste solvents and chemicals: methanol (U154) xylene (U239) pyridine (U196) cresol (U052) 1, 1, 1-trichloroethane (U226) naphthalene (U165)	From spill cleanup, small quantities of solvents or chemicals mixed with soil. No free liquids present
2. BOP baghouse dust (D008)	Dust from the production of leaded steel. Contains lead. Waste is a finely divided solid.
3. Chromate filter cake (D007)	Filter cake material, containing no free liquids, generated during in-process recycling of chromate solution at the galvanizing line. Waste contains hexavalent chromium.
4. Tar decanter sludge (K087)	This listed EPA hazardous waste is solid, except during warm weather when it becomes viscous. It is a listed waste because of its potential to contain phenol and naphthalene.
5. Corrosive wastes (D002)	Waste acids/bases

Although permitted to store a variety of wastes, Site S-12 was envisioned originally as an emergency storage facility, to store the excess drums from the BOP Baghouse Dust Drum Storage Area (S-5) or containerized residue from spill cleanup awaiting offsite disposal.

Site S-12 consists of a 42 feet X 42 feet area located inside hazardous waste landfill Site D-2. Access to Site D-2 and hence, to S-12 is limited to a single entrance gate and otherwise is restricted by a slag dike surrounding Site D-2. With drums stored upright in a single layer, the design maximum holding capacity of Site S-12 is 200 drums.

#### Waste Characterization

The wastes permitted for storage in Site S-12 are as follows:

<u>Waste Code</u>	<u>Hazardous Constituent/Characteristic</u>
D008	Lead
D007	Hexavalent Chromium
K087	Naphthalene and Phenol
U154	Methanol
U239	Xylene
U196	Pyridine
U052	Cresol
U226	1, 1, 1-Trichloroethane
U165	Naphthalene

#### Maximum Waste Inventory

At any time during the life of the facility, the maximum inventory of 55-gallon drums in Site S-12 is 200.

#### Normal Operating Procedure

Hazardous wastes stored in Site S-12 for offsite disposal are brought to the site previously loaded and sealed in DOT-approved, 55-gallon drums. Typically, drums are accumulated onsite until there is a sufficient number to comprise a full load for a transporter, or in the event of a material spill, the contained residue would be stored onsite while arrangements can be made for the offsite disposal of the material.

### Removal of Waste Inventory

No containers have been stored at Site S-12 since April 27, 1983 when 28 drums containing BOP baghouse leaded steel dust (D008) were shipped offsite for disposal. This shipment constituted the total inventory of hazardous wastes stored within Site S-12.

### Procedures for Facility Decontamination

Because hazardous wastes are brought to Site S-12 in sealed drums and because hazardous waste releases are routinely contained and corrective action implemented in accordance with Lorain Plant's "Contingency Plan for Emergencies Involving Hazardous Waste Materials," it is unlikely that facility decontamination procedures will be required. Furthermore, because Site S-12 lies on a landfilled section of Site D-2, implementation of the Closure Plan for Hazardous Waste Landfill D-2 submitted to the Ohio EPA on March 20, 1984 will effectively address decontamination of Site S-12. The closure plan includes covering all exposed landfill surface with a combination of soil and synthetic liners.

### Closure Certification

On approval of the closure plan for Site S-12 by the Ohio EPA and prior to implementation of the closure plan for Site D-2, an independent registered professional engineer will conduct an onsite inspection of S-12 to certify that all containerized hazardous wastes have been removed and properly disposed. Certificates attesting to the closure of Site S-12 will be submitted to the Ohio EPA and USEPA by both the independent professional engineer and the appropriate USSC authority.